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Attorney for Plaintiff ADRIAN ROMERO, JR.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**ADRIAN ROMERO, JR.,**  
Plaintiff,

vs.

**CALIFORNIA HIGHWAY PATROL,**  
Defendant.

**CASE NO.: 2:21-CV-01978-JAM-DB**

**JOINT STIPULATION TO EXTEND  
TRIAL AND PRE-TRIAL DATES AND  
ORDER**

**Pursuant to Fed. R. Civ. P. 16(b)(4) and L.R.  
16-14**

The parties, Plaintiff ADRIAN ROMERO, JR. ("Plaintiff") and Defendant CALIFORNIA HIGHWAY PATROL ("Defendant"), through their respective attorneys of record, hereby move the Court to reschedule certain dates set by this Court in the Pre-Trial Scheduling Order of January 5, 2022 (Docket Document 13 herein).

WHEREAS, Plaintiff filed his Third Amended Complaint on January 18, 2022 after substantial meet and confer with Defendant.

WHEREAS, the Court issued a Pre-Trial Scheduling Order on January 5, 2022, setting the Final Pretrial Conference to August 11, 2023 and Trial to September 25, 2023.

WHEREAS, Plaintiff's attorney has experienced an unanticipated personal matter (death of spouse) that has impacted her time and ability to prepare and respond to discovery requests that will produce information that will enable the parties to engage in meaningful settlement negotiation.

WHEREAS, Plaintiff's counsel has recently been informed that the original attorney for Defendant CHP, has left the Department of Justice and that a new attorney for Defendant CHP has recently been assigned. Plaintiff's attorney met and conferred with Defendant's new attorney on or about October 14, 2022 regarding Plaintiff's concerns on the progress of this action due to personal challenges.

WHEREAS, CHP's new attorney has no objection to Plaintiff's attorney's request for extension of trial date in light of Plaintiff's attorney's adverse personal circumstances, acknowledges Plaintiff's attorney's situation as a legitimate reason for an extension of time, and accepts in good faith the reasons offered.

Now, therefore, IT IS HEREBY STIPULATED by and between all the parties to this action as follows:

1. That the Final Pretrial Conference currently set for August 11, 2023 be continued to March 2024.

2. That the Trial set in this action currently set for September 25, 2023 be continued to April 2024.

3. That all other deadlines set by the Court in its Pre-Trial Scheduling Order of January 5, 2022 be moved to a later corresponding date. The parties suggest the following continued deadlines:

Last Day to Disclose Experts	-	July 2023
Last Day Discovery	-	October 2023
Last Day to file Dispositive Motion	-	December 2023
Hearing on Dispositive Motion	-	January 2024

**IT IS SO STIPULATED:**

1 Dated: October 25, 2022

LAW OFFICES OF DENISE EATON-MAY, PC

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3 By: /s/ Denise Eaton-May

4 DENISE EATON-MAY

Attorneys for Plaintiff

ADRIAN ROMERO, JR.

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7 Dated: October 25, 2022

Rob Bonta

Attorney General Of California

Celine M. Cooper

Supervising Deputy Attorney General

10  
11 By: /s/ Vanessa W. Mott

12 VANESSA W. MOTT

Deputy Attorney General

Attorneys for Defendant

CALIFORNIA HIGHWAY PATROL

**ORDER**

Based on the Joint Stipulation of the parties, and good cause appearing therefor, IT IS  
HEREBY ORDERED:

1. That the Final Pretrial Conference currently set for August 11, 2023 be continued to March 22, 2024 at 10:00 AM.
2. That the Trial set in this action currently set for September 25, 2023 be continued to May 6, 2024 at 9:00 AM.
3. That all other deadlines set by the Court in its Pre-Trial Scheduling Order of January 5, 2022 be moved to a later corresponding date as set forth below:

Last Day to Disclose Experts	-	July 28, 2023
Last Day Discovery	-	October 27, 2023
Last Day to file Dispositive Motion	-	December 8, 2023
Hearing on Dispositive Motion	-	February 13, 2024 at 1:30 PM

**IT IS SO ORDERED.**

DATED: October 25, 2022

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE